

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

WILLIAM PERRIN,

Plaintiff,

V.

RUBINBROWN, LLP,

Defendant.

Case No. 4:15-cv-00850-HEA

JOINT MOTION FOR PROTECTIVE ORDER

COME NOW Plaintiff and Defendant, and for their Joint Motion for Protective Order,
state as follows:

1. The parties are engaging in initial disclosures and written discovery.
2. RubinBrown, LLP has identified certain confidential and proprietary information and documents, and desires to produce those materials to Plaintiff's counsel. These documents include confidential records pertaining to applicants and employees, including personal credit information.
3. A Protective Order is necessary to allow for disclosure of relevant information to Plaintiff while protecting the confidential and proprietary nature of RubinBrown's documents.
4. The parties have agreed to the entry of a Protective Order governing the production of said confidential and proprietary information and documents. A Protective Order with agreed upon terms is attached hereto as Exhibit A.

WHEREFORE, the parties respectfully request this Court enter the Protective Order provided in Exhibit A, and for all such other and further relief as this Court deems proper and just.

SANDBERG PHOENIX & von GONTARD P.C.

By: /s/ Narcisa P. Symank
Andrew R. Kasnetz, #29863
Narcisa P. Symank, #59755
600 Washington Avenue - 15th Floor
St. Louis, MO 63101-1313
314-231-3332
314-241-7604 (Fax)
akasnetz@sandbergphoenix.com
nsymank@sandbergphoenix.com

Attorneys for Defendant
RubinBrown LLP

WEINHAUS & POTASHNICK

By: /s/ Mark Potashnick (w/consent)
Mark Potashnick, E.D. Mo. # 35970
11500 Olive Blvd., Suite 133
St. Louis, Missouri 63141
314-997-9150
314-997-9170 (Fax)
markp@wp-attorneys.com

and

LIBERMAN, GOLDSTEIN & KARSH

By: /s/ Eli Karsh (w/consent)
Eli Karsh, #47524
230 South Bemiston, Suite 1200
St. Louis, Missouri 63105
elikarsh@aol.com
Attorneys for Plaintiff

Certificate of Service

I certify that on this 22nd day of November 2016, this document was filed electronically with the Clerk of the Court, to be served by operation of the Court's electronic filing system upon the following counsel of record:

Mark Potashnick
markp@wp-attorneys.com
Eli Karsh
elikaresh@aol.com
Attorneys for Plaintiff

/s/ Narcisa P. Symank